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13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 UNITED STATES OF AMERICA,

17 Case No. 2:25-mj-00303-DJA

18 Plaintiff,

19 **Stipulation for an Order**
20 **Directing Probation to Prepare**
21 **a Criminal History Report**

22 v.

23 ISAEL ALCIDES RAMIREZ-GALAN,

24 Defendant.

25
26 IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah, United
27 States Attorney, and Clay Plummer, Special Assistant United States Attorney, counsel for
28 the United States of America, Rene L. Valladares, Federal Public Defender, and Megan
29 Hopper-Rebegea, Assistant Federal Public Defender, counsel for defendant ISAEL
30 ALCIDES RAMIREZ-GALAN, that the Court direct the U.S. Probation Office to prepare
31 a report detailing the defendant's criminal history.

32 This stipulation is entered into for the following reasons:

33 1. The United States Attorney's Office has developed an early disposition
34 program for immigration cases, authorized by the Attorney General pursuant to the

1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
2 extended to the defendant a plea offer in which the parties would agree to jointly request an
3 expedited sentencing immediately after the defendant enters a guilty plea.

4 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
5 history until after the defendant enters his guilty plea unless the Court enters an order
6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
7 a defendant's initial appearance when charged by indictment.

8 3. The U.S. Probation Office informs the government that it would like to begin
9 obtaining the criminal history of defendants eligible for the early disposition program as
10 soon as possible after their initial appearance so that the Probation Office can complete the
11 Presentence Investigation Report by the time of the expected expedited sentencing.

12 4. Accordingly, the parties request that the Court enter an order directing the
13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

14 DATED this 15th day of April, 2025.

Respectfully Submitted,

17 RENE L. VALLADARES
Federal Public Defender

SIGAL CHATTAH
United States Attorney

18 /s/Megan Hopper-Rebegea
19 Assistant Federal Public Defender
20 Counsel for Defendant
ISAEL ALCIDES RAMIREZ-GALAN

/s/ Clay Plummer
CLAY A PLUMMER
Special Assistant United States Attorneys

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

V.

ISAEL ALCIDES RAMIREZ-GALAN

Defendant.

Case No. 2:25-mj-00303-DJA

Order Directing Probation to Prepare a Criminal History Report

Based on the stipulation of counsel, good cause appearing, and the best interest of
the parties being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 16th day of April, 2025.


DANIEL J. ALBRUGTS

HONORABLE DANIEL J. ALBRIGTS
UNITED STATES MAGISTRATE JUDGE